

THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
WILKES-BARRE DIVISION

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IN RE: : CHAPTER 13  
MICHAEL AND DEBRA MILBRODT :  
Debtor(s) : CASE NO. 5:19-03539  
:

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**OBJECTION TO CERTIFICATION OF DEFAULT**

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NOW COMES, Michael and Debra Milbrodt, the above Debtor, by and through their counsel, Tullio DeLuca, Esq., and files this Objection to Certification of Default and states the following:

1. On November 14, 2019, a Motion to Dismiss due to material default was filed.
2. On June 14, 2024, Jack N. Zaharopoulos, Esq. filed a Certificate of Default stating that the Debtor has failed to cure the arrears.
3. Debtor's Counsel is in the process of contacting the Debtor to ascertain if the payments have been made and/or if Debtor is in possession of funds needed to cure the arrears.
4. The Debtor requests that a hearing be scheduled on the Objection to the Certificate of Default.

WHEREFORE, the Debtor respectfully requests that this Honorable Court sustain the Objection to the Certification of Default and deny the dismissal of the Chapter 13 Case.

Respectfully submitted,

Date: June 16, 2024

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
PA ID #59887  
Counsel for Debtor  
381 N. 9<sup>th</sup> Avenue  
Scranton, Pa 18504

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on June 16, 2024, he caused a true and correct copy of Debtor's Objection to Certification of Default to be served Via electronic filing on the following CM/ECF participants:

Jack N. Zaharopoulos, Esq. at info@pamd13trustee.com

Date of Mailing: June 16, 2024

/s/Tullio DeLuca  
Tullio DeLuca, Esquire